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10 *Attorneys for Defendants Pinnacle Entertainment, Inc.;*  
11 *Ameristar Casino Council Bluffs, LLC;*  
12 *Ameristar Casino East Chicago, LLC; Cactus Pete's, LLC;*  
13 *Louisiana-I Gaming; PNK (Baton Rouge) Partnership;*  
*PNK (Bossier City), L.L.C.; PNK (Lake Charles)*  
*L.L.C.; PNK (River City), LLC; PNK Vicksburg, LLC;*  
*and Washington Trotting Association, LLC*

14  
15 **UNITED STATES DISTRICT COURT**  
16  
17 **DISTRICT OF NEVADA**

18 KRYSTALL LOCKETT, AMBER L.  
19 CASWELL, JACQUELINE DAVIS,  
DAVID C. DEVUN JR., TABATHA K.  
DOZIER, SETH B. ISTRE, RACAL  
JOHNSON, CYNTHIA J. KOFRON,  
TONISHA S. LONZO, NATHAN J.  
MCDERMOTT, JEREMY MITCHELL,  
LAURA PEREZ, WAYNE SHEFFIELD  
JAMAICA S. YOUNG, individually, and  
on behalf of all others similarly situated,

20  
21 Plaintiffs,  
22

23 vs.  
24

25 PINNACLE ENTERTAINMENT, INC.,  
26 AMERISTAR CASINO COUNCIL  
BLUFFS, LLC D/B/A AMERSITAR  
27 COUNCIL BLUFFS, AMERISTAR CASINO

28 **CASE NO. 2:19-cv-00315-APG-NJK**

DEFENDANTS' UNOPPOSED  
MOTION [AND PROPOSED ORDER]  
TO EXTEND TIME TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFFS' COMPLAINT (DKT #1)  
(FIRST REQUEST)

1 EAST CHICAGO, LLC D/B/A AMERISTAR  
2 EAST CHICAGO, CATCUS PETE'S, LLC  
3 D/B/A CACTUS PETE'S RESORT CASINO,  
4 LOUISIANA-I GAMING, A LOUISIANA  
5 PARNTERNSHIP IN COMMENDAM  
6 D/B/A BOOMTOWN NEW ORLEANS  
7 PNK (BATON ROUGE) PARTNERSHIP  
8 D/B/A L'AUBERGE BATON ROUGE,  
9 PNK (BOSSIER CITY), L.L.C. D/B/A  
10 BOOMTOWN BOSSIER CITY, PNK (LAKE  
CHARLES), L.L.C. D/B/A  
11 L'AUBERGE LAKE CHARLES,  
12 PNK (RIVER CITY), LLC D/B/A RIVER  
13 CITY, PNK VICKSBURG, LLC D/B/A  
14 AMERISTAR VICSBURG, WASHINGTON  
15 TROTTING ASSOCIATION,

16 Defendants.

17 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1, Defendants  
18 Pinnacle Entertainment, Inc.; Ameristar Casino Council Bluffs, LLC; Ameristar Casino East  
19 Chicago, LLC; Cactus Pete's, LLC; Louisiana-I Gaming; PNK (Baton Rouge) Partnership; PNK  
20 (Bossier City), L.L.C.; PNK (Lake Charles) L.L.C.; PNK (River City), LLC; PNK Vicksburg,  
21 LLC; and Washington Trotting Association, LLC (collectively "Defendants") hereby request that  
22 this Court grant them an extension of time up to and including April 3, 2019, to answer or  
23 otherwise respond to Plaintiffs' Complaint. In further support of this Motion, Defendants state  
24 as follows:

25 1. Plaintiffs filed a 46-page Complaint on February 21, 2019. Dkt. #1  
26 2. Service of process has been properly completed for at least some of the  
27 Defendants, and to the extent any Defendant has not been properly served by the date of the  
filing of this Motion, Defendants agree to accept such service.

28 3. Currently, the earliest deadline to answer or otherwise respond to Plaintiffs'  
Complaint is March 15, 2019, for the first-served Defendants.

4. Defendants collectively request an extension up to and including April 3, 2019, to  
answer or otherwise respond to Plaintiffs' Complaint.

5. This requested extension of time to respond to the Complaint will not prejudice Plaintiffs, nor will it unduly delay the timely disposition of this matter. Indeed, this Motion seeks to ensure the efficient and proper use of judicial resources by allowing Defendants to consolidate their responses.

6. No prior extension has been requested by Defendants.

7. Counsel for Defendants discussed this request for an extension of time with Plaintiffs' counsel via telephone on March 13, 2019, and Plaintiffs have no objection to Defendants' request. Further, Plaintiffs' counsel represented that "Plaintiffs are not requiring Defendants to agree to tolling before Plaintiffs agree to an extension."

WHEREFORE, Defendants respectfully request that the Court grant them an extension of time up to and including April 3, 2019, to answer or otherwise respond to Plaintiffs' Complaint.

Dated this 15<sup>th</sup> day of March 2019.

## **GREENBERG TRAURIG, LLP**

By: /s/ Mark E. Ferrario  
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## ORDER

Based upon the above and foregoing,

## IT IS SO ORDERED

~~NANCY J. KOPPE~~  
United States Magistrate Judge  
DATED this 18<sup>th</sup> day of March, 2019